Paoli Rail Yard

Last Update: August 2002

EPA Region 3 EPA ID# PAD980692594 Pennsylvania 7th Congressional District Conrail Repair Shop

Other Names: Conrail Paoli Paoli PCB Site Paoli Railcar Facility

Current Site Status

The U.S. Environmental Protection Agency and the Army Corps of Engineers are overseeing the cleanup of the Paoli Rail Yard Superfund Site (Site). Recent developments at the Site led to a temporary work stoppage and have resulted in scheduling delays for the cleanup of the Rail Yard Property and the Residential Properties.

Rail Yard Cleanup

In January 2002, the Rail Companies (SEPTA, Amtrak, and Conrail), informed EPA that they had terminated their contract with IT Corporation (IT) because IT was failing to perform its obligations under the contract. IT was the contractor responsible for managing the ongoing construction activities at the Rail Yard on behalf of the Rail Companies. Shortly after receiving a notice of termination from

the Rail Companies, IT filed for bankruptcy. IT and its construction sub-contractor, AWS Remediation Inc., left the Site in February 2002 and cleanup activities at the Rail Yard came to a stop while the issue of IT's bankruptcy and termination were before the bankruptcy court. In April 2002, the bankruptcy court accepted the Rail Companies' decision to terminate their contract with IT. Based on the court's ruling, the Rail Companies must now re-bid the construction contract.

The Rail Companies recently issued a contract to Advanced GeoServices Group (AGC) to provide engineering oversight at the Rail Yard on an interim basis, until the Rail Companies are able to contract with a permanent remedial contractor. AGC's task include developing specifications for the remaining work to be completed at the Rail Yard portion of the Site, providing emergency and maintenance services, and completing critical activities identified by EPA, including acceptance of non-rail yard soils.

In addition to the delays described above, the local Townships closed a portion of Central Avenue for approximately six weeks beginning on March 8, 2002 due to concerns about the safety of a section of the newly constructed retaining wall which extends along the northern boundary of the Rail Yard. With the road closed, the Rail Companies completed work to stabilize the retaining wall. A one hundred foot section of the wall was removed to relieve pressure from the back of the wall and eliminate any potential hazard. The work was inspected and the Township and the road was re-opened. The Rail Companies and AGC are now in the process of preparing a plan to permanently repair the wall. Prior to its approval, the plan will be reviewed by EPA, the U.S. Army Corps of Engineers, Pennsylvania Department of Environmental Protection, as well as the local Townships.

Cleanup of Non-Rail Yard Areas

In addition to stopping work at the Rail Yard Property, in January 2002 the Rail Companies informed American Premiere Underwriters (APU) and its contractor Unicorn Management Inc. (formerly SCIENTECH), the parties conducting the clean-up of contaminated residential and stream areas, that no additional residential soils or steam sediments could be accepted at the Rail Yard at that time. EPA has been working with the Rail Companies and APU to ensure that the necessary arrangements are made to allow for the acceptance of soils

at the Rail Yard so that the clean up of the residential and stream areas may proceed. The Rail Companies have tasked AGC with the responsibility for acceptance of contaminated soils at the Rail Yard Property. Unicorn Management Consultants initiated the cleanup of several residential properties in November 2001. Approximately 25 properties still need to be cleaned up. Cleanup of the remaining residential properties is schedule to resume in August 2002 and should be completed this year.

Site Description

The Paoli Rail Yard Site includes the 28-acre Rail Yard Property, the surrounding residential areas and the approximately 400 acre watershed north of the Rail Yard Property. The Rail Yard consists of an abandoned electric train repair facility and a commuter rail station. The Penn Central Corporation was the original owner and operator of the facility. The facility is currently owned by Amtrak and is operated by the Southeastern Pennsylvania Transportation Authority (SEPTA). Prior to SEPTA, during Amtrak's ownership, Conrail operated the Rail Yard. Commuter trains were serviced, repaired, and stored at this facility. Routine maintenance and repair of railroad cars involved electrical equipment that contained PCBs. Until 1986, the Rail Yard was unsecured and easily accessible; residents and commuters regularly used it as a shortcut to reach both the train station and surrounding commercial properties.

In the late 1970s, both the EPA and the Pennsylvania Department of Environmental Resources (now called Pennsylvania Department of Environmental Protection or PADEP) inspected the Rail Yard. Amtrak, Conrail, and SEPTA (the Rail Companies) were required to determine the extent of contamination and to correct any problem areas. The Rail Companies collected samples, cleaned up, and further studied the area. In 1985, samples taken in 1984 were made available to the EPA, indicating a severe PCB problem at the Rail Yard. These sample results were verified, and in 1986, the EPA filed a complaint seeking an order to require the Rail Companies to limit access to the Rail Yard, control the movement of PCBs from the Rail Yard, conduct sampling and analysis, and to clean up the Rail Yard. The Rail Yard is surrounded on three sides by residential communities, and on the fourth side, by commercial facilities.

Site Responsibility

This site is being addressed through Federal, State, and potentially responsible parties' actions.

NPL Listing History

Our country's most serious, uncontrolled, or abandoned hazardous waste sites can be cleaned using federal money. To be eligible for federal cleanup money, a site must be put on the National Priorities List. This site was proposed to the list on January 22, 1987 and formally added to the list August 30, 1990.

Threats and Contaminants

Erosion of soils from the Rail Yard has contaminated nearby Valley Creek and its tributaries with PCBs. The yards of several residences in the area also were found to be contaminated. Car shop workers had elevated levels of PCBs in their blood. Direct contact with the soil is the main health threat to the general public. This threat has been substantially reduced by fencing the Rail Yard property, in 1986. Soil excavation in 1989 further reduced the risk from direct soil contact.

In addition, the State banned fishing in nearby Valley Creek when PCBs were found in fish and creek sediments. Valley Creek flows through Valley Forge National Historic Park.

Contaminant descriptions and associated risk factors are available on the Agency for Toxic Substance and Disease Registry, an arm of the CDC, web site at http://www.atsdr.cdc.gov/hazdat.html

Cleanup Progress

The direct contact threat has been substantially reduced by limiting access to the Rail Yard by fencing, installed in 1986, and by soil excavation in 1989. The State banned fishing in nearby Valley Creek when PCBs were found in fish and creek sediments. Extensive sampling of the Site by the Rail Companies, the State, and the EPA has characterized the contamination. Three basins were constructed by the EPA to prevent erosion of contaminated soils, and about 3500 cubic yards of contaminated soils were excavated from 35 yards in the nearby residential area. The excavated areas were backfilled.

EPA paved the parking lot and other high-use areas of the car shop in 1987 to prevent the spread of the PCB-contaminated soils from vehicular and foot traffic.

EPA signed a final Record of Decision (ROD) in July 1992 requiring excavation and treatment using a solidification process for approximately 28,000 cubic yards of contaminated Rail Yard soils. The ROD also requires excavation of contaminated soil from the residential area and contaminated stream sediments. Additionally, a system to recover fuel oil from the ground water is currently operational. EPA and PADEP negotiated with the Rail Companies to conduct the Rail Yard portion of the remedy. On April 17, 1997, the Rail Companies signed an Early Action Order agreeing to conduct the remedial design of the Rail Yard remedy. In April 1999, a federal court approved the negotiated consent decree. The consent decree requires the Amtrak, Conrail, and SEPTA to pay \$500,000 to EPA and \$100,000 to PADEP as compensation for prior removal activities involving the site, and to perform all remaining response actions at the Rail Yard Property. The settlement also obligates the parties to pay \$850,000 to federal and state trustees to settle claims for damage to natural resources.

Activities conducted at the Rail Yard since May 2001 include: clearing and grubbing; removal of debris including rail and ties; installation of new security fencing and improvements to existing fencing; construction of on-site haul roads to manage construction vehicles during soil cleanup activities; construction of two new storm water retention basins; preparation of areas on the Rail Yard to accept non-rail yards soils and stream sediments with low levels of polychlorinated biphenyls (PCBs); and the construction of an on-site containment cell to accept treated soils.

In the Fall of 2001, the Rail Companies began processing contaminated Rail Yard soils which were excavated as part of the above construction activities. In addition, a retaining wall was constructed along Central Avenue to aid in providing permanent erosion controls at the Rail Yard. The excavation and on-site treatment of the bulk of contaminated Rail Yard soils began following completion of the retaining wall in early December 2001. To date approximately one half of PCB contaminated Rail Yard soils have been processed and placed in the on-site containment cell.

Additionally, most of the buildings located on the Rail Yard have been decontaminated, demolished and disposed of off-site at an approved disposal facility. The main car shop building is being used temporarily to store and process PCB contaminated soils. Use of the car shop has helped to reduce noise and control dust during the processing of soils. Once the processing is complete, the car shop will be decontaminated, demolished, and disposed of off-site.

On September 30, 1996, EPA issued an Order to American Premier Underwriters, Inc., (successor to the Penn Central Corporation), to conduct the cleanup of contaminated residential areas and stream sediments. Per EPA's requirements, residential soils are to be cleaned up to an average concentration of 2 parts per million (ppm) PCBs at each individual property. In November 2001, EPA approved a final design for the cleanup of residential properties. The cleanup of residential soils began shortly thereafter. Excavated residential soils are being taken to the Rail Yard for containment and/or treatment. APU is continuing with its efforts to obtain access to several properties which have not yet been sampled.

During the Summer of 2001, sampling of the stream sediments along Valley Creek and Little Valley Creek and their tributaries was conducted to determine where cleanup is required. The stream sediments are to be cleaned to a concentration of 1 ppm PCBs. EPA has provided Unicorn Management Consultants with comments on the preliminary design report for the stream portion of the cleanup. Cleanup of the stream areas will proceed following EPA's approval of a final design for this portion of the project.

Sampling conducted at the head of the Hollow Road Tributary identified high levels of PCBs in the soils and sediments in and around the area which was previously fenced to restrict access. PCBs were detected in this area at concentrations up to about 200 ppm, much higher than other downstream areas, as a result EPA approved a plan to conduct an expedited removal of contaminated soils and sediments form this area. In December 2001, with EPA's oversight, Unicorn Management Consultants excavated approximately 500 cubic yards of contaminated soils and sediments from the head of the Hollow Road Tributary. Following excavation activities, the area was re-sampled and preliminary results indicate that the cleanup goal of 1

ppm was achieved. All excavated soils and steam sediments were taken to the Rail Yard for treatment and the area has been restored to prevent future erosion.

EPA continues to coordinate with Tredyffrin and Willistown Townships, as well as Chester County, on a plan to develop the Site after the remediation is complete. A Transportation Center Complex is planned for the Rail Yard Property.

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Detailed public files (Administrative Record) on EPA's actions and decisions for this site can be examined at the following locations:

Paoli Library 18 Darby Road Paoli, PA 19301

U.S. EPA Region III 6th Floor Docket Room 1650 Arch Street. Philadelphia, PA 19103 215-814-3157

Please call to schedule an appointment.